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February 17, 2021

**VIA ECF AND BY FAX (212) 805-7942**

The Honorable Alvin K. Hellerstein  
Daniel Patrick Moynihan United States  
Courthouse, Room 1620  
500 Pearl Street  
New York, NY 10007

The extension until May 3, 2021 is granted. The status conference, currently scheduled for March 5, 2021 is adjourned until May 14, 2021 at 10am.

So ordered,

/s/

Alvin K. Hellerstein  
2/18/21

Re: Trondheim Capital Partners, LP v. William H. Sadlier, Inc.  
Case No.: 20-cv-06286 (AKH)

Dear Judge Hellerstein:

This firm represents Defendant William H. Sadlier (“Sadlier”) with regard to the above referenced matter. We write this letter, with the consent of counsel for Plaintiff Trondheim Capital Partners, LP (“Trondheim”), Joe Sibley, Esq., to respectfully request a second extension, through May 1, 2021, for Sadlier to comply with the Court’s Order, dated January 8, 2021 (Doc. No. 24). The current deadline is February 22, 2021. Sadlier similarly requests, with the consent of Trondheim, that the Court adjourn the status conference currently scheduled for March 5, 2021 to a date following May 1, 2021.

To date Sadlier has already produced a substantial number of the documents that it was ordered to produce to Trondheim, including:

- (i) Annual Reports for 2007 through 2012;
- (ii) Monthly financial reports for 2019 through 2020;
- (iii) Board of Directors and Shareholder Meeting minutes for 2020; and
- (iv) Summary of executive compensation for 2018 through 2020.

Sadlier continues to gather the additional broad range of documents subject to the Court’s Order. However, due to Covid-19 access restrictions, and limited personnel, some categories of

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The Honorable Alvin K. Hellerstein  
February 17, 2021  
Page 2

documents are more difficult to access than others. Further, the additional time will afford the parties sufficient time to explore if there is a path to resolve this matter.

For these reasons, it is respectfully requested that the Court grant Sadlier's on-consent request to adjourn its deadline to respond to the Court's Order through May 1, 2021 and adjourn the status conference currently scheduled for March 5, 2021.

Respectfully submitted,



Michael H. Gibson

cc: Counsel for Plaintiff (Via ECF)